

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

CIVIL ACTION NO. 04-30177

**JOEL PENTLARGE,
Plaintiff,**

v.

**ROBERT MURPHY, *et al.*,
Defendants.**

**MOTION TO EXTEND TIME OF DEFENDANTS KATHLEEN
DENNEHY, ROBERT MURPHY AND THE MASSACHUSETTS DEPARTMENT
OF CORRECTION TO RESPOND TO PLAINTIFF'S MOTION TO CONSOLIDATE
AND PLAINTIFF'S THIRD SUPPLEMENTAL COMPLAINT**

The Massachusetts Department of Correction ("DOC"), Kathleen Dennehy and Robert Murphy (collectively, the "DOC Defendants"), hereby request that the Court extend the time for them to respond to the Plaintiff's Third Supplemental Complaint and Plaintiff's Motion to Consolidate until June 30, 2005.

As grounds for this motion, the DOC Defendants state that the additional time is needed due to a death in the undersigned counsel's family and her resulting absence from work between May 26 and June 6, 2005.

WHEREFORE, the DOC Defendants respectfully request that this Court allow the DOC Defendants until June 30, 2005, to respond to the Plaintiff's Motion to Consolidate and the Plaintiff's Third Supplemental Complaint.

Certificate Pursuant to Local Rule 7.1

On June 7, 2005, the undersigned counsel discussed the request for additional time to respond to the Plaintiff's Third Supplemental Complaint and the Motion to Consolidate with

John Swomley, plaintiff's counsel. Mr. Swomley indicated that he assents to this additional time. Kevin Mulvey, counsel for defendants Pushkina and O'Donnell, also agrees to this additional time.

Respectfully submitted,
Massachusetts Department of Correction,
Kathleen Dennehy and Robert Murphy,

By their attorneys,

NANCY ANKERS WHITE
Special Assistant Attorney General

By: /s/ Mary P. Murray
Mary P. Murray, Counsel (BBO # 555215)
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Dated: June 8, 2005

Certificate of Service

I hereby certify that I caused a copy of the within document to be served by first class mail, postage pre-paid as follows: (1) John Swomley, Esquire, counsel for plaintiff Joel Pentlarge; and (2) Kevin Mulvey, Esquire, counsel for defendants Pushkina and O'Donnell, Mulvey & Sneider, LLP, 1622A Beacon Street, Brookline, MA 02446-2201.

/s/ Mary P. Murray
Mary P. Murray

Dated: June 8, 2005